

REMARKS

Claims 1-6, 9-12, 18-19, 27-29, 34, 37-39, and 44 are allowable.

Regarding the rejection of claims 1-6, 9-12, 18-20, 27-30, 34, 37-40, 44, and 47-49 under 35 U.S.C. § 102(e) over Uchiyama (US 6,766,174 B2) on page 2 of the Office Action, claims 1, 27 and 37 have been amended to overcome these rejections. Claims 20, 30, 31, 40, 41 and 47-49 have been cancelled.

Claim 1, from which claims 2-6, 9-12, and 18-20 depend, now recites a first universal serial bus (USB) interface to communicate with a first type of external device and a second data interface of a second type to communicate with a second type of external device. As pointed out by the Office Action at p. 14, these limitations are not disclosed by Uchiyama.

With respect to claim 27, from which claims 30 and 34 depend, and claim 37, from which claims 38-39 and 44 depend, these claims as amended recite communicating with an external device through a universal serial bus (USB) interface. As pointed out by the Office Action at p. 14, these limitations are not disclosed by Uchiyama.

Accordingly, Uchiyama does not disclose each and every limitation of claims 1-6, 9-12, 18-19, 27-29, 34, 37-39, and 44, and this deficiency is not remedied by the citation of Alexis. In view of the foregoing, it is respectfully submitted that the rejection of these claims is improper at this time and withdrawal of this rejection is therefore respectfully requested.

Claims 13-17, 21-23, 25-26, 32-33, 35, 42-43, and 45 are allowable.

Regarding the rejection of claims 13-17, 21-23, 25-26, 32-33, 35, 42-43, and 45 under 35 U.S.C. § 103 over Uchiyama in view of Alexis (US 2004/0072544 A1) on page 9 of the Office Action, as described above Uchiyama and Alexis fail to teach or suggest every limitation of claims 1, 27 and 37. The Office Action at p. 25 states that "the feature wherein the first data interface is a universal serial bus (USB) interface was well known in the art, as taught by Alexis." Applicants respectfully traverse this characterization of Alexis. Alexis refers to a USB interface only as part of adapter circuitry. See Alexis p. 12 [0092]. This adapter circuitry is not

used to communicate with a first type of external device. Instead, the adapter circuitry disclosed in Alexis is "removably connected to the input/output pins of a cellular telephone." Alexis p. 11 [0087]. Thus, the adapter circuitry in Alexis does not allow a base station or control module to communicate with a first type of external device. Thus, even if there were a suggestion in Alexis or Uchiyama to combine the two references (which there is not), the references together fail to teach or suggest the specific combination of claims 1, 27, or 37, as well as the claims that depend thereon.

Accordingly, Uchiyama and Alexis fail to teach or suggest every limitation of claims 13-17, 21-23, 25-26, 32-33, 35, 42-43, and 45, at least by virtue of their respective dependency on claims 1, 27 and 37. Furthermore, these dependent claims recite additional limitations neither disclosed nor suggested by the cited references.

With respect to claims 22, 33 and 43, each of these claims recite the further feature of the first type of external device being a camera. At page 13, the Office Action states that Alexis discloses a "personal video recording device." Applicants respectfully submit that Alexis nowhere discloses or suggests a camera as an external device. The only point at which Alexis discusses personal video recording devices is on p. 2 [0028]. However, Alexis specifically states that the personal video recording device or other communication device discusses is "configured for communication over PSTN." Applicants respectfully submit that a camera is not configured for communication over a Public Switched Telephone Network (PSTN). Accordingly, Alexis teaches away from using a camera as an external device to the apparatus as claimed.

With regards to claim 23, this claim recites the further feature of the first type of external device being a personal data assistant (PDA). At page 14, the Office action states that Alexis discloses the feature wherein the first type of external device is a PDA. However, Applicants respectfully point out that Alexis nowhere discloses the use of a PDA as an external device to the apparatus as claimed. The passages cited by the examiner (Alexis p. 2 [0028-29] and p. 3 [0031]) refer only to telephones, computer systems, facsimile machines, printers, set-top boxes, and personal video recording devices. Accordingly, Alexis nowhere teaches or suggests the use of a PDA as the first type of external device.

With respect to claims 26, 35 and 45, these claims recite the further feature of the second type of data interface that is a portable media reader and/or writer interface. At page 15, the Office action states that Alexis discloses the feature wherein the second type of data interface is a portable media reader and/or writer interface. However, Applicants respectfully point out that Alexis nowhere discloses the second type of data interface as a portable media reader and/or writer interface. The passages cited by the examiner (Alexis p. 2 [0028-29], p. 3 [0031]) refer only to telephones, computer systems, facsimile machines, printers, set-top boxes, and personal video recording devices. Accordingly, Alexis nowhere teaches or suggests the second type of data interface as being a portable media reader and/or writer interface.

Applicants respectfully submit that the obviousness rejection of claims 13-17, 21-23, 25-26, 32-33, 35, 42-43, and 45 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

Claims 24, 36 and 46 are allowable.

Regarding the rejection of claims 24, 36, and 46 under 35 U.S.C. § 103 over Uchiyama in view of Harrison, et al. (US 2002/011190 A1 ("Harrison")) on page 18 of the Office Action, as discussed above Uchiyama fails to disclose each and every limitation of claims 1, 27 and 37 as amended. Furthermore Harrison fails to make up for this deficiency. In particular, Harrison nowhere discloses the use of a USB interface to communicate with an external device. Accordingly, Uchiyama and Harrison fail to teach or suggest every limitation of claims 24, 36 and 46, at least by virtue of their respective dependency on claims 1, 27 and 37. Furthermore, these dependent claims recite additional features neither disclosed nor suggested by the cited references.

In particular, claims 24, 36 and 46 each recite the feature wherein the external device is a digital storage card. At page 18, the Office Action states that Harrison discloses the feature wherein the first type of external device is a memory flash card. Applicants respectfully disagree that Harrison a first type of external device. Harrison discloses a base station for a personal digital assistant (PDA). Harrison p. 1 [0002]. The base station is used to back up the memory of a PDA. Harrison p. 1 [0007]. There is no discussion, suggestion, or teaching of connecting the base station disclosed in Harrison to a base station or control module for communicating between

a wireless wide area network and a wireless local area telephone. Moreover, there is no suggestion in either Uchiyama or Harrison of combining the two references.


Applicants respectfully submit that the obviousness rejection of claims 24, 36 and 46 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

For at least the foregoing reasons, Applicants respectfully submit that the present application is now in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney or agent.

The Commissioner is hereby authorized to charge any fees that may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date


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